



THE CITY OF NEW YORK
LAW DEPARTMENT

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April 17, 2012

BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Manera, Jennifer v. City of New York, et al., 12 CV 0722 (BMC)

Dear Judge Cogan:

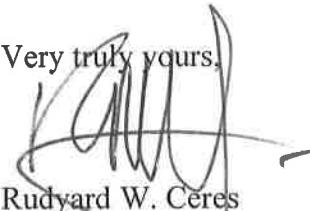
I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant, the City of New York (“the City”), in the above-referenced civil rights action, and I write pursuant to Your Honor’s Order dated April 16, 2012, in response to the parties’ Joint Submission Letter also dated April 16, 2012.

As Your Honor suggested, the undersigned had every intention of contacting the arresting officer (Police Officer Pablo Santiago) in this case, however, he retired from the NYPD on June 10, 2011, hence his contact details are not available to me. Accordingly, we are liaising with NYPD Legal who is attempting to contact the officer at his last known address but, as yet, we have not had a response. Should we not hear back from him shortly, we will subpoena his last known address from the Police Pension Fund so that we can attempt to contact him directly.

Further, rather than simply wait for NYPD Legal, the undersigned also contacted the Integrity Control Officer (“ICO”) of the 83rd Precinct who has located the Roll Call for the date of the incident (February 8, 2011) which, the ICO has informed me, has identified Officer Santiago’s supervising officer and his team for that day. I should be in receipt of a faxed copy of the Roll Call today and will reach out to Officer Santiago’s supervising officer and/or members of his team to better understand the facts of this case. I expect that I will have an opportunity to speak with some of the members of the team in advance of the April 23, 2012 Initial Conference.

I thank the Court for its time and consideration of this matter.

Very truly yours,



Rudyard W. Ceres
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